



U.S. Department of Justice

Environment and Natural Resources Division

33-40-210-07149

Land Acquisition Section

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April 19, 2006

via Federal Express

David A. Vidrine, Esq.
625 Baronne St.
New Orleans, LA 70113
(504) 569-0661

Re: United States v. 33.92356 Acres of Land and Juan Piza-Blondet, et al.,
Civil No. 3:98-cv-01664-CCC-GAG (D. P.R.)

Dear David:

This letter reiterates a number of oral discovery requests that the United States made to Defendants during the depositions that occurred during the week of April 3, 2006. At your earliest convenience, please provide us with responses to the following requests made pursuant to Rule 26 of the Federal Rules of Civil Procedure and our prior written discovery requests:

1. A complete and updated curriculum vitae for Professor James Joyce that includes (1) a list of all publications authored by him within the preceding ten years; (2) a listing of all other cases – including the court, docket number, and contact information for the attorneys involved – in which he has testified as an expert at trial or deposition, or prepared an expert report, within the past four years from the date of his expert report (including the ongoing condemnation case involving sand deposits that Dr. Joyce referenced at his deposition).
2. A complete listing – including the court, docket number, and contact information for the attorneys involved – of any other cases in which Carlos Gaztambide has testified as an expert at trial or deposition, or prepared an expert report, within the past four years from the date of his expert report. This request would include the two condemnation matters that Mr. Gaztambide referenced in his deposition.
3. Copies of all written appraisal reports prepared by Mr. Gaztambide from five years prior to the date of taking, or December 2, 1998, through today involving property that is (1) zoned C-R or B-2; or (2) contains sand deposits; or (3) is the subject of a condemnation proceeding.
4. Defense counsel represented that Mr. Juan Piza-Blondet intends to offer at trial an opinion of value for the subject property that is based on the written appraisal report prepared by Carlos Gaztambide. To the extent that Mr. Juan Piza-Blondet intends to offer an opinion of value that differs from Mr. Gaztambide's opinion of value, we request that you provide us with a written "computation" of the amount of just compensation demanded by Mr. Piza-Blondet, and the complete basis and reasons therefor. Alternatively, if Mr. Piza-Blondet intends to offer the same opinion of value as Mr. Gaztambide, we request a written admission to that effect under Rule 36 of the Federal Rules of Civil Procedure.

Please let me know if you have any questions or concerns.

Sincerely,

Jeffrey M. Tapick
Trial Attorney

Patel, Gayatri (ENRD)

From: Tapick, Jeffrey (ENRD)
Sent: Wednesday, April 19, 2006 6:17 PM
To: David Vidrine (dcv1234@cox.net); DVidrine@mumphreylaw.com
Subject: United States v. 33.92 Acres of Land Discovery Requests

Attachments: April 19, 2006 Letter to Vidrine.pdf

David,

Please see the attached letter reiterating discovery requests made at the depositions several weeks ago. Please let me know if you have any questions.

Thanks,
Jeff



April 19, 2006
Letter to Vidri...

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